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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)	Case No. 2:10-CR-578-PMP-RJJ
)	
Plaintiff,)	
)	STIPULATION FOR
v.)	PROTECTIVE ORDER
)	
LINDA LIVOLSI,)	
)	
Defendant.)	
_____)	

IT IS HEREBY STIPULATED AND AGREED between the undersigned attorneys, that this Court issue an Order protecting from disclosure to the public any discovery documents containing the personal identifying information such as social security numbers, drivers license numbers, dates of birth, or addresses, of victims and co-defendants in this case. Such documents shall be referred to hereinafter as "Protected Documents." The parties state as follows:

1. Protected Documents which will be used by the United States in its case in chief include personal identifiers, including social security numbers, drivers license numbers, dates of birth, and addresses, of the victims or co-defendants in this case. In addition, many of these documents may include personal identifiers that defendant may choose to use as evidence in this case.

2. The United States agrees to provide Protected Documents without redacting the personal identifiers of victims, with the possible exception of 302 reports, memoranda of interview and tax records that it reserves the right to produce in redacted form.

1 3. Access to Protected Documents by defendant will be restricted to personnel
2 authorized by the Court, namely defendant, attorneys of record and attorneys, paralegals,
3 investigators, experts, and secretaries employed by the attorneys of record and performing services
4 on behalf of defendant. As such, the following restrictions will be placed on defendant,
5 defendant's attorney and the above-designated individuals unless and until further ordered by the
6 Court. Defendant, defendant's attorney and the above-designated individuals shall not:

7 a. make copies for, or allow copies of any kind to be made by any other
8 person of Protected Documents, or allow the Protected Documents to be otherwise disseminated;
9 b. allow any other person to read Protected Documents; and
10 c. use Protected Documents for any other purpose other than preparing to
11 defend against the charges in the Indictment or any further superseding indictment arising out of
12 this case.

13 4. Defendant shall not retain any copies of the Protected Documents. If defendant
14 creates any notes that contain any personal identifiers received from the Protected Documents,
15 then defendant's attorney shall retain such notes for defendant.

16 5. Defendant's attorney shall inform any person to whom disclosure may be made
17 pursuant to this order of the existence and terms of this Court's order.

18 6. The requested restrictions shall not restrict the use or introduction as evidence of
19 discovery documents containing personal identifying information such as social security numbers,
20 drivers license numbers, dates of birth, and addresses during the trial of this matter.

21 7. Upon conclusion of this litigation, defendant's attorney shall return to counsel for
22 the United States, or destroy and certify to counsel for the United States, the destruction of all

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1 discovery documents containing personal identifying information such as social security numbers,
2 drivers license numbers, dates of birth, and addresses within a reasonable time, not to exceed
3 thirty days after defendant has exhausted all appellate rights.

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5 DANIEL BOGDEN
United States Attorney

6 /s/

2/2/11

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8 MICHAEL CHU
Assistant U.S. Attorney

DATE

9 /s/

1/27/11

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11 MATTHEW DUSHOFF
Counsel for defendant Linda Livolsi

DATE

12
13 **ORDER**

14 IT IS SO ORDERED this _____ day of _____ 2011.

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17 _____
UNITED STATES DISTRICT JUDGE
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